

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

*In re: Clearview AI, Inc. Consumer
Privacy Litigation*

)
)
) Case No. 1:21-cv-00135
)
)
) Hon. Sharon Johnson Coleman
)
)
)

**CLEARVIEW DEFENDANTS’ UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER THE FIRST AMENDED COMPLAINT**

Defendants Clearview AI, Inc. (“Clearview”), Rocky Mountain Data Analytics LLC, Hoan Ton-That, and Richard Schwartz (collectively, the “Clearview Defendants”), by and through their counsel, hereby file this unopposed motion to extend the time to file an answer to Plaintiffs’ First Amended Complaint. In support of this motion, the Clearview Defendants state as follows:

1. Plaintiffs filed the First Amended Complaint on June 29, 2021, at which time the Clearview Defendants’ motion to dismiss was pending before the Court.

2. On February 14, 2022, the Court entered an order granting in part and denying in part the Clearview Defendants’ motion to dismiss. Accordingly, the Clearview Defendants are required to file an answer to the First Amended Complaint.

3. The Clearview Defendants are considering their options with respect to the Court’s February 14 Order and seek an extension until March 14, 2022 to file an answer to the First Amended Complaint. No prejudice will occur to any party as a result of this short delay.

4. Plaintiffs have filed a response stating that they take no position on this motion. (Dkt. 300.)

WHEREFORE, the Clearview Defendants respectfully move the Court to grant them an extension until March 14, 2022 to answer the First Amended Complaint.

March 2, 2022

Respectfully submitted,

By: /s/ Precious S. Jacobs-Perry

Precious S. Jacobs-Perry (ARDC No. 6300096)
Howard S. Suskin (ARDC No. 6185999)
JENNER & BLOCK LLP
353 North Clark Street
Chicago, Illinois 60654
Phone: (312) 222-9350
pjacobs-perry@jenner.com
hsuskin@jenner.com

Lee Wolosky (pro hac vice)
Andrew J. Lichtman (pro hac vice)
JENNER & BLOCK LLP
919 Third Avenue
New York, New York 10022-3908
Phone: (212) 891-1600
lwolosky@jenner.com
alichtman@jenner.com

Floyd Abrams
Joel Kurtzberg
CAHILL GORDON & REINDEL LLP
32 Old Slip
New York, NY 10005
Phone: (212) 701-3000
fabrams@cahill.com
jkurtzberg@cahill.com

Attorneys for Defendants Clearview AI, Inc.,
Hoan Ton-That, Richard Schwartz, Rocky
Mountain Data Analytics LLC, and Thomas
Mulcaire

CERTIFICATE OF SERVICE

I certify that on March 2, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a Notice of Electronic Filing to all counsel of record.

By: /s/ Precious S. Jacobs-Perry